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Attorneys for Defendant Early Warning Services, LLC

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Thomas Pamplona,

Plaintiff,

v.

Early Warning Services, LLC,

Defendant.

Civil No. 2:19-cv-01000-RFB-VCF

**STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING
(Second Request)**

Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Thomas Pamplona, by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time to File Responsive Pleading (Second Request) up to and including August 8, 2019. In support of the Stipulation, the parties state the following:

1. EWS was served with the Complaint through its registered agent on or around June 17, 2019 making its responsive pleading due on or around July 8, 2019.

2. The undersigned counsel for EWS was recently retained by EWS in connection with this matter and is continuing to review the allegations asserted in the Complaint.

3. Previously, the Court granted EWS an extension of time to respond to the Complaint through July 30, 2019 (Dkt. No. 8).

4. After the Court granted the first request for an extension, the parties have engaged in and continue to engage in good faith settlement discussions.

5. Counsel for Plaintiff has agreed to a second requested extension through August 8, 2019 and the requested extension will not impact any other deadlines in this case.

6. The requested extension is made for good cause and is not being requested for purposes of delay. Instead, the requested extension will allow the parties additional time to explore a potential resolution of this matter.

7. This is the second request to extend the deadline for EWS to file its responsive pleading.

8. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive pleading shall be extended through August 8, 2019.

Dated this 30th day of July, 2019.

Respectfully Submitted,

By: /s/ Shane Clayton
Shane Clayton, Esq.
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By: /s/ Miles N. Clark
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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 31, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July 2019, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which causes service upon all counsel registered thereon.

/s/ Shane Clayton